

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GAIL GALLOWAY,	:	CIVIL NO. 1:CV-00-0649
Plaintiff	:	
	:	
	:	
v.	:	
	:	
	:	
	:	
PENNSYLVANIA BOARD OF	:	
PROBATION AND PAROLE, <i>et al.</i>,	:	
Defendants	:	

REQUEST FOR DISCOVERY

Gail Galloway, (Plaintiff), request the attached Discovery be completed within 10 days and in compliance with the Federal Rules of Civil Procedure. ALL ANSWERS TO INTERROGATORIES ARE TO BE IN WRITING AND UNDER OATH. The detailed Instructions provided previously by Plaintiff shall be in full effect and are hereby incorporated by reference. DO NOT USE BOILERPLATE OR NON RESPONSIVE ANSWERS OR FRIVOLOUS OBJECTIONS, OR A MOTION TO COMPEL WILL BE FILED WITH A REQUEST FOR SANCTIONS BECAUSE THE DEFENDANTS IN THE PAST HAVE REFUSED TO ANSWER THE INTERROGATORIES.

The information requested is relevant to the issues of the case and Plaintiff may wish to get a deposition from and /or call the person referred to as a witness.

Respectfully submitted


Gail Galloway
RD #1, Box 30
Petersburg, PA 16669
(814) 669-9164

May 14, 2005

INTERROGATORIES TO DEFENDANT CHARLES GIORNESTO

MUST BE IN WRITING AND UNDER OATH

1. Give full name and address of the person you say reported to you that Gail Galloway's son David Galloway had inquired about purchasing a .50 caliber gun for Gail Galloway that you then reported to George Johnson.

2. Give the date and time and location, to the best of your knowledge, that the conversation between the person you say reported the information referred to in question 1. took place. Give full details.

3. Describe fully the exact contents and details of this conversation referred to in question 1. to the best of your recollection, knowledge, and belief.

Person submitting Interrogatories: Gail Galloway, Plaintiff
RD#1, Box 30
Petersburg, PA 16669

Person answering Interrogatories: _____

I swear and affirm that the answers to the forgoing Interrogatories are given under oath subject to the penalties of perjury according to Federal Law.

Signature of Person answering these Interrogatories

DATE!